

EXHIBIT 16
FILED UNDER SEAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

Civil Action No. 4:20-cv-00957-SDJ

THE STATE OF TEXAS, et al., :
:
Plaintiffs, :
:
v. :
:
GOOGLE LLC, :
:
Defendant. :

The deposition of GUARIONEX DÍAZ MARTÍNEZ,
called as a witness by the Defendant, pursuant to
the Federal Rules of Civil Procedure, before Saul
Berrios Batista, Notary Public for the
Commonwealth of Puerto Rico, and Dennis Zambataro,
Registered Professional Reporter, commencing on
May 1, 2024 at 10:07 a.m., at the Office of the
Attorney General for the Commonwealth of Puerto
Rico, San Juan, Puerto Rico.

Job No. CS6672002

1 APPEARANCES:

2 On behalf of the Defendants:

3 JEANETTE BAYOUMI, ESQUIRE
4 FRESHFIELDS BRUCKHAUS DERINGER, LLP
5 601 Lexington Avenue
6 31st Floor
7 New York, NY 10022
8 212.277.4043

9 jeanette.bayoumi@freshfields.com

10 - and -

11 GAYLE R. KLEIN, ESQUIRE
12 FRESHFIELDS BRUCKHAUS DERINGER, LLP
13 3 World Trade Center
14 New York, NY 10007
15 212.230.4645
16 gayle.klein@freshfields.com

17 On behalf of the Plaintiffs:

18 KYLE BATES, ESQUIRE
19 HAUSFELD
20 33 Whitehall Street
21 14th Floor
22 New York, NY 10004
23 646.357.1100
24 kbates@hausfeld.com

25 On behalf of the State of Texas:

ALEX J. BROWN, ESQUIRE
THE LANIER LAW FIRM
6810 Cypress Creek Parkway
Houston, Texas 77069
713.659.5200
alex.brown@lanierlawfirm.com

I N D E X

Witness: Guarionex Díaz Martínez	Page
Examination by Ms. Bayoumi	6
Examination by Mr. Bates	136
Exhibit Index	
Exhibit 1 Notice of Deposition	
Exhibit 2 White binder	14
Exhibit 3 Plaintiff States' Combined Responses and Objections to Google's Second Set, etc.	21
Exhibit 4 Plaintiff State's 6th Amended Responses	32
Exhibit 5 Plan de Medios	61
Exhibit 6 P2P Campaign Performance, Sexual Offender Registry	71
Exhibit 7 P2P Invoice	78
Exhibit 8 P2P Marketing	83
Exhibit 9 Vocero Advertising Invoice	92
Exhibit 10 GFR Media Invoice	98
Exhibit 11 Plaintiff States' Amended Advisory	104

1 privilege -- attorney-client privilege?

2 MR. BATES: Objection to form.

3 THE WITNESS: To the extent it was
4 part of the work done by attorneys, yes.

5 BY MS. BAYOUMI:

6 Q. Okay. And as you sit here today, is
7 the Puerto Rico Department of Justice unaware of
8 any complaints about Google's advertising
9 technology or display advertising?

10 A. As of today, the Department of
11 Justice is not aware.

12 Q. What actions did Puerto Rico take to
13 comply with its discovery obligations in this
14 case?

15 A. Again, different meetings with
16 corresponding personnel in the Department of
17 Justice. We conducted searches and meetings
18 with attorneys.

19 Q. Did Puerto Rico institute a
20 document-hold notice related to this litigation?

21 A. No.

22 Q. Why not?

23 A. We just didn't.

24 Q. So it's possible that there are some
25 documents that could have been deleted that were

1 COURT REPORTER'S CERTIFICATE

2 I, DENNIS ZAMBATARO, Certified Court
3 Reporter in the United States of America, do hereby
4 certify that the foregoing is a true and correct
5 transcript of the proceedings had in the within
6 entitled and numbered cause, in the Commonwealth of
7 Puerto Rico, in the City of San Juan, on the date
8 and time noted on the cover page.

9 I do further certify that the foregoing
10 transcript has been prepared under my direction.

11

12

13

14


DENNIS ZAMBATARO, RPR, CSR

15

16

17

18

19

20

21

22

23

24

25